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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	}	347 CASE NO. 3:09-CR-00345-MHP
Plaintiff,		
v.		STIPULATION TO CONTINUE STATUS
HIEU NGUYEN,		HEARING AND PROPOSED ORDER
Defendant.	}	

IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, Christine Wong, Assistant United States Attorney for Plaintiff, and Paul N. Puri, Attorney for Defendant HIEU NGUYEN, that the Status Conference set for June 22, 2009, at 9:00 a.m., may be continued to **July 27, 2009, at 9:00 a.m.**

This stipulation is entered into at the request of the defendant as his counsel will be unavailable on the date presently set for Status Conference due to continuing six co-defendant capital murder preliminary hearing in Sonoma County that began May 11, 2009, to allow

defense counsel time to review discovery, and to allow the parties to continue to pursue and discuss plea negotiations.

The parties further stipulate that the time from June 22, 2009 to July 27, 2009 is excludable under the Speedy Trial Act (18 USC § 3161 et seq) and in particular, sections 18 USC §§ 3161(h)(8)(B)(i) and 3161 (h)(8)(B)(iv) to allow for adequate preparation and continuity of counsel and further that the ends of justice outweigh the public's interest in a speedy trial.

The parties also agree that time continues to be excluded pursuant to the Speedy Trial Act under 18 U.S.C. §§ 3161(h)(1)(F) and (h)(8)(A) in order to allow the defense to review the initial discovery and for preparation of defendant's case.

DATE: June 18, 2009

By /s/ Christine Wong
CHRISTINE WONG
Assistant U.S. Attorney

DATE: June 18, 2009

By /s/ Paul N. Puri
PAUL N. PURI
Attorney for HIEU NGUYEN

ORDER

IT IS HEREBY ORDERED that the status conference presently set for June 22, 2009, at 9:00 a.m., is continued until **July 27, 2009**, at **9:00 a.m.**

DATED: June 19, 2009

